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GERALD E. FURST
CLERK OF COURTS
CUYAHOGA COUNTY

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PER	DEPUTY

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

Nancy J. Amantea
11248 Norton Drive
Chesterland, Ohio 44026

And

Carmen P. Arrigo
11248 Norton Drive
Chesterland, Ohio 44026

And

Jeffrey H. Berry
1894 Surrey Place
Gates Mills, Ohio 44040

And

George Bostick IV
537 Myrtle Road
Naples, Florida 34108

And

Steven A. Calabrese
1110 Euclid Avenue, Suite 300
Cleveland, Ohio 44115

And

Complaint
BRIAN J CORRIGAN
CA. CV 07 638207
JUDGE

Exhibit A

Raquel Castro
64 Eldred Avenue
Bedford, Ohio 44146

And

Sheldon Gordon
3450 Green Road
Beachwood, Ohio 44122

And

CCAG, Ltd.
1110 Euclid Avenue, Suite 300
Cleveland, Ohio 44115

And

Domenic D. Ciricillo
6091 Castlehill Drive
Highland Heights, Ohio 44143

And

James M. Ciricillo
6091 Castlehill Drive
Highland Heights, Ohio 44143

And

Linda Ciricillo
6091 Castlehill Drive
Highland Heights, Ohio 44143

And

Mary Ciricillo
797 Village Trail
Gates Mills, Ohio 44040

And

Coffee King, Inc.
c/o Frank Regalbuto
797 Village Trail
Gates Mills, Ohio 44040

And

Horace Consolo
8000 Eagle Road
Kirtland, Ohio 44094

And

John Consolo, Jr.
777 Village Circle
Gates Mills, Ohio 44040

And

John Consolo, Sr.
777 Village Circle
Gates Mills, Ohio 44040

And

Joseph Consolo
777 Village Circle
Gates Mills, Ohio 44040

And

Thomas Consolo
777 Village Circle
Gates Mills, Ohio 44040

And

Mary D'Angelo
1913 East 123rd Street
Cleveland, Ohio 44106

And

Nicole Delauro
1367 Clearview Road
Lyndhurst, Ohio 44124

And

Susan Russell Giordano
199 Willow Lane
Chagrin Falls, Ohio 44022

And

David Koski
6320 Longspur Road
Highland Heights, Ohio 44143

And

Robert J. Kups
33411 Cedar Road
Mayfield Heights, Ohio 44124

And

Michael LaMonica
19608 Thornridge Avenue
Cleveland, Ohio 44135

And

Robert LaMonica
1534 Rockefeller Road
Wickliffe, Ohio 44092

And

Virginia LaMonica
9491 Ridgeside Road
Mentor, Ohio 44060

And

Frank Laricca, Jr.
5130 Parkside Trail
Solon, Ohio 44139

And

Donald Lombardo

511 Jeanette Road
Richmond Heights, Ohio 44143

And

Anthony Lorello
8110 Sandstone Drive
Sagamore Hills, Ohio 44067

And

Barbara Madrigal
64 Eldred Avenue
Bedford, Ohio 44146

And

Rodrigo Madrigal, Jr.
8003 Goldenrod Lane
Bensalem, Pennsylvania 19020

And

Charles J. Magistro
67 Spring Hill Circle
Wayne, New Jersey 07470

And

Grace McKibben
1925 East 123rd Street
Cleveland, Ohio 44106

And

Barbara Russell Melzer
122 Colony Road
Darien, Connecticut 06820

And

James Mitchell
11511 Heath Road
Chesterland, Ohio 44026

And

Angela Molitoris
381 West St. Andrews Drive
Highland Heights, Ohio 44143

And

Robert Montanari
7632 Westlake Boulevard
Kent, Ohio 44240

And

David E. Nager
574 Charles Place
Highland Heights, Ohio 44143

And

Carmen Parise
386 West Glen Eagle Drive
Highland Heights, Ohio 44143

And

Charles Parise
4550 Edmund Drive
South Euclid, Ohio 44121

And

Basil Perin, Jr.
12060 Parker Drive
Chesterland, Ohio 44026

And

Paul Perrotti
1414A Golden Gate Boulevard #20
Mayfield Heights, Ohio 44124

And

Dan Petrich
6220 Inland Shores Drive
Mentor, Ohio 44060

And)

Frank Regalbuto)
797 Village Trail)
Gates Mills, Ohio 44040)

And)

Frank Regalbuto, Jr.)
31100 Ainsworth Drive)
Pepper Pike, Ohio 44124)

And)

Frank Regalbuto, Jr. (As Parent and Next Friend)
of Avalon Regalbuto, a minor)
31100 Ainsworth Drive)
Pepper Pike, Ohio 44124)

And)

Frank Regalbuto, Jr. (as Parent and Next Friend)
of Delilah Regalbuto., a minor)
31100 Ainsworth Drive)
Pepper Pike, Ohio 44124)

And)

Frank Regalbuto, Jr. (as Parent and Next Friend)
of Frank Regalbuto III, a minor)
31100 Ainsworth Drive)
Pepper Pike, Ohio 44124)

And)

Frank Regalbuto, Jr. (as Parent and Next Friend)
of Marco Regalbuto, a minor)
31100 Ainsworth Drive)
Pepper Pike, Ohio 44124)

And)

Frank Regalbuto, Jr. (as Parent and Next Friend)
of Nina Regalbuto, a minor)
31100 Ainsworth Drive)

Pepper Pike, Ohio 44124)

And)

Joseph Regalbuto, Sr.)
7900 Gates Mills Estates)
Gates Mills, Ohio 44040)

And)

Joseph Regalbuto, Sr. (as Parent and Next Friend)
of Joseph Regabuto Jr., a minor))
7900 Gates Mills Estates)
Gates Mills, Ohio 44040)

And)

Michael Regalbuto, Sr.)
769 Village Trail)
Gates Mills, Ohio 44040)

And)

Michael Regalbuto, Sr. (as Parent and Next Friend)
of Donte Regalbuto, a minor))
769 Village Trail)
Gates Mills, Ohio 44040)

And)

Michael Regalbuto, Sr. (as Parent and Next Friend)
of Gabriele Regalbuto, a minor))
769 Village Trail)
Gates Mills, Ohio 44040)

And)

Michael Regalbuto, Sr. (as Parent and Next Friend)
of Isabel Regalbuto, a minor))
769 Village Trail)
Gates Mills, Ohio 44040)

And)

Michael Regalbuto, Sr. (as Parent and Next Friend)
of Michael Regalbuto, Jr., a minor)
769 Village Trail)
Gates Mills, Ohio 44040)

And)

Frank Regalbuto, Jr. (as Parent and Next Friend)
of Rachele Regalbuto, a minor)
31100 Ainsworth Drive)
Pepper Pike, Ohio 44124)

And)

Joseph Regalbuto, Sr. (as Parent and Next Friend)
of Nicholas Regalbuto, a minor)
7900 Gates Mills Estates)
Gates Mills, Ohio 44040)

And)

Michael Regalbuto, Sr. (as Parent and Next Friend)
of Renee Regalbuto, a minor)
769 Village Trail)
Gates Mills, Ohio 44040)

And)

Reggie Homes, Incorporated)
797 Village Trail)
Gates Mills, Ohio 44040)

And)

Gina Rosson)
c/o JoAnn Consolo)
777 Village Circle)
Gates Mills, Ohio 44040)

And)

Jane K. Russo)
1930 Gulf Shore Boulevard)
Naples, Florida 34102)

And)

Frank Salvo
7561 Northwoods Court
Concord, Ohio 44077

And

Cristie Sciuva
37455 Fox Run
Solon, Ohio 44139

And

Ray Sciuva
37375 Fox Run
Solon, Ohio 44139

And

Salvatore Sciuva
7500 Liberty Road
Solon, Ohio 44139

And

Theresa Sciuva
37455 Fox Run
Solon, Ohio 44139

And

Albert Thomas Skinner
1435 Bethlehem Road
Paris, Kentucky 40361

And

Betty Susteric
15123 Trails Landing
Strongsville, Ohio 44136

And

Ted Teresczuk Trust
13410 Ledgebrook Lane
Chagrin Falls, Ohio 44022

And

Gae Teresczuk
13410 Ledgebrook Lane
Chagrin Falls, Ohio 44022

And

Charles Valentine
7243 Pelican Bay Boulevard
Naples, Florida 34108

And

Virginia Vitantonio
2110 Murray Hill Drive
Cleveland, Ohio 44106

And

Carol Voase
11322 Glen Eagle Court
Concord, Ohio 44077

And

Charlene M. Warner
35049 North Turtle Trail, Unit D
Willoughby, Ohio 44094

And

West Asphalt Paving Company
6829 Eastland Road
Middleburg Heights, Ohio 44130

And

Paulette York
5355 Summit Road
Lyndhurst, Ohio 44124

Plaintiffs

v.

COMPLAINT

(Plaintiffs Demand A Trial By

Innotrac Corporation
6655 Sugarloaf Parkway
Duluth, Georgia 30097

And

Scott Dorfman
c/o Innotrac Corporation
6655 Sugarloaf Parkway
Duluth, Georgia 30097

And

David L. Gansey
c/o Innotrac Corporation
6655 Sugarloaf Parkway
Duluth, Georgia 30097

And

David Ellin
c/o Innotrac Corporation
6655 Sugarloaf Parkway
Duluth, Georgia 30097

And

Larry C. Hanger
c/o Innotrac Corporation
6655 Sugarloaf Parkway
Duluth, Georgia 30097

And

Robert Toner, Jr.
c/o Innotrac Corporation
6655 Sugarloaf Parkway
Duluth, Georgia 30097

Defendants

COUNT ONE

(Violation of Section 10 (b) of the Securities and Exchange Act of 1934, 15 U.S.C. Section 10j

(b) and Securities And Exchange Commission Rule 10b-5, 17 C.F.R. 240.10b-5)

1. Plaintiffs are individuals or business entities residing or having their principal places of business at the addresses contained in the caption.
2. Defendant Innotrac Corporation ("Innotrac") is a business entity having offices at 6655 Sugarloaf Parkway, Duluth, Georgia 30097. The individual defendants are individuals who each, at all times material to this lawsuit, held high positions of authority with Innotrac. Each of the individual defendants' place of business is c/o Innotrac Corporation, 6655 Duluth, Georgia 30097. At all times material to this lawsuit the individual defendants held the following positions with Innotrac:

Scott Dorfman – Chairman, President and Chief Executive Officer

David L. Gansey – Senior Vice President, Chief Financial Officer and

Secretary

David Ellin – Senior Vice President, Sales

Larry Hanger – Senior Vice President, Client Services

Robert J. Toner, Jr. – Vice President, Logistics

3. Some time prior to 1998 David Dadante ("Dadante"), a resident of the Cleveland, Ohio area, created an investment vehicle that he called the IPOF fund. IPOF Fund was a "doing business as" designation of Coffee King, Inc., an Ohio Corporation. Dadante actively promoted the IPOF fund and managed the monies that were deposited with him for inclusion in the IPOF fund. Dadante developed and distributed promotional literature regarding the IPOF fund and created a contract to be signed by persons who deposited money with Dadante for inclusion in the IPOF fund. As described by Dadante in the promotional literature relating to the IPOF fund that Dadante delivered to potential depositors, the IPOF fund had a very specific and limited mission. Dadante specified in his promotional literature that money deposited with the IPOF fund would be used solely to purchase blocks of stock in initial public offerings ("IPO") which IPO stock was expected to rise in value quickly and would be sold by the IPOF fund almost immediately after purchase in order to generate significant profits. Dadante maintained that he had strong connections at the highest levels of the securities industry and that those connections would alert Dadante as to which initial public offerings would generate significant profits for the IPOF fund. Dadante had no such contacts and was not privy to any special information.

4. Each of the plaintiffs deposited money in the IPOF fund and received promotional literature relating to the IPOF fund from Dadante. Dadante deposited money received from the plaintiffs in a bank account titled to Coffee King, Inc. In addition to delivering the promotional literature to the

plaintiffs, Dadante told them that the IPOF fund would return in excess of twenty per cent (20%) per year to its depositors. In fact, any money distributed to plaintiffs by Dadante was money that Dadante acquired through his operation of a "Ponzi Scheme". Dadante did not tell plaintiffs that he was operating a "Ponzi Scheme". Dadante also told the plaintiffs that the IPOF fund monies would be kept in accounts established at Goldman, Sachs and at Merrill, Lynch which accounts would be insured up to Fifty Million Dollars (\$50,000,000.00) and that the IPOF fund monies in the Goldman, Sachs and Merrill, Lynch accounts would be used only (i) to purchase initial public offering stock, (ii) to return profits to IPOF fund participants and (iii) to pay the reasonable and necessary expenses of the IPOF fund including a reasonable management fee to Dadante. Dadante never placed IPOF fund money in accounts at Merrill Lynch or Goldman, Sachs. Dadante used money deposited with him by plaintiffs to trade in stocks that were not IPO stocks. Dadante did not tell plaintiffs where IPOF fund money was really kept and what stocks Dadante traded with IPOF fund money.

5. Each of the plaintiffs, at the time they initially delivered money to Dadante for deposit in the IPOF fund signed the agreement that Dadante prepared for execution by depositors which agreement stated what Dadante could do with funds deposited in the IPOF fund. In the document signed by each plaintiff at the time he or she invested with Dadante, he or she was identified as "depositor" and Dadante was identified as the "President" of the IPOF fund.

None of the plaintiffs signed any document that identified them as partners, limited or general, in any enterprise with which Dadante was affiliated.

6. Stephen Glantz ("Glantz") while employed at various brokerage firms, including Advest Everin and Ferris Baker Watts ("FBW"), was the broker who executed stock trades that Dadante made with the money that had been deposited in the IPOF fund. Glantz and Dadante made certain stock trades without the knowledge and consent of IPOF fund depositors. Dadante did not tell plaintiffs that he had used IPOF fund money to open accounts at Advest, Everin and FBW. Glantz was aware that Dadante was using IPOF fund money to make those stock trades and Glantz and Dadante knew that those trades were beyond the scope of Dadante's authority as the IPOF fund manager and were not suitable transactions for the IPOF fund. Neither Glantz nor Dadante told plaintiffs that IPOF fund money was being used to buy and sell stock that was not IPO stock. Glantz and his employers, Advest Everin and FBW, engaged in activities in concert with Dadante using IPOF fund money that were designed to maximize the commission paid to Glantz, Advest, Everin and FBW due to stock trades made by Dadante and the IPOF fund.

7. Glantz, Advest Everin and FBW knew that Dorfman, Gansey, Ellin, Hanger and Toner had options to purchase Innotrac stock from Innotrac at relatively low prices. Innotrac stock was thinly traded and there was little or no market in which to sell the Innotrac stock that Dorfman, Gansey, Ellin, Hanger and Toner could purchase from Innotrac with their options thereby strongly

curtailing the ability of Dorfman, Gansey, Ellin, Hanger and Toner and Innotrac to profit by and through the exercise of their Innotrac stock options. Dorfman, Gansey, Ellin, Hanger and Toner entered into an arrangement with Glantz, Advest Everin and FBW and Dadante whereby Dadante would use IPOF fund money to purchase large amounts of Innotrac stock from Dorfman, Gansey, Ellin, Hanger and Toner at artificially high prices. The specific purpose of the IPOF Fund, a purpose known to each defendant named herein, precluded the use of IPOF Fund money to buy shares of Innotrac. Dadante did not advise plaintiffs that he had arranged with defendants to use IPOF fund money to purchase shares of Innotrac from defendants and Dadante did not advise defendants that IPOF fund money was being used to purchase Innotrac stock.

8. In or about 2002 Dadante knowingly and with the knowing assistance of Glantz, Advest, Everin and FBW began using IPOF fund money to purchase shares of Innotrac. Glantz, Advest, Everin and FBW and Dadante had prearranged with Dorfman, Gansey, Ellin, Hanger and Toner and Innotrac for the individual defendants to make their option shares of Innotrac available for purchase by Dadante with IPOF fund money. Virtually all of the Innotrac stock that Dadante purchased with IPOF fund money were shares that Dorfman, Gansey, Ellin, Hanger and Toner had acquired from Innotrac with their stock options and then made available for sale to Dadante at prices substantially higher than the option prices they had paid to Innotrac for those Innotrac shares. Defendants knew that Dadante was engaging in improper

conduct designed to artificially inflate the market value of Innotrac shares. Defendants knew that Dadante was purchasing the individual defendants' Innotrac option stock at artificially inflated prices. Actions designed to artificially inflate the price of Innotrac stock, actions of which defendants were aware and actions that were concealed from the plaintiffs included, but were not limited to:

- a. Marking the close;
- b. Wash sales;
- c. Cross sales;
- d. Fraudulent sales to and from the accounts of investors who were not aware that they had traded Innotrac stock, and
- e. Manipulations designed to enhance Dadante's margin buying power and to avoid the adverse consequences of margin calls.

Defendants, Glantz, Advest, Everin and FBW and Dadante did not let plaintiffs know that the practices and activities enumerated above were taking place. The practices and activities enumerated above were designed by defendants, Glantz, Advest, Everin and FBW and Dadante to maximize Dadante's ability to purchase Innotrac shares from the individual defendants, which shares the individual defendants had purchased from Innotrac, at

artificially inflated prices. To entice Dadante to continue to purchase Innotrac shares from the individual defendants at artificially inflated prices, defendants, Glantz, Advest, Everin and FBW told Dadante that they would create a secondary offering whereby Dadante could sell his holdings in Innotrac stock for Twelve Dollars (\$12.00) per share. Defendants, Glantz, Advest, Everin and FBW never intended to create a secondary offering. Defendants, Glantz, Advest, Everin and FBW and Dadante did not tell plaintiffs that a secondary offering was contemplated or that a secondary offering would not occur.

9. By the time that the plaintiffs discovered that Dadante had improperly used IPOF fund money to purchase Innotrac stock, that discovery occurring in or about November 2005, Dadante had improperly used IPOF fund money to purchase approximately Four Million Three Hundred Thousand (4,300,000) shares of Innotrac. By working with Dadante as purchaser of their Innotrac stock, stock that would ordinarily not command so high a price on the open market and for which there may not have been a market for a thinly traded stock such as Innotrac, Innotrac, Dorfman, Gansey, Ellin, Hanger and Toner made profits that, in the aggregate, exceeded Twenty Million Dollars (\$20,000,000.00)

10. The arrangement described herein between Innotrac, Dorfman, Gansey, Ellin, Hanger and Toner and Glantz, Advest, Everin and FBW and Dadante whereby Dadante improperly used IPOF fund money to purchase Innotrac stock constituted a manipulative device, scheme or artifice to fraudulently induce plaintiffs as IPOF Fund depositors to purchase securities. Plaintiffs were

knowingly denied knowledge of that arrangement. In working knowingly with Glantz, Advest, Everin and FBW and Dadante to cause Dadante to purchase Innotrac stock, stock that Innotrac and each of the individual defendants knew should not have been purchased by the IPOF Fund, at artificially high prices improperly using IPOF Fund money as described above, Innotrac, Dorfman, Gansey, Ellin, Hanger and Toner violated, among other provisions, Section 10 (b) of the Securities and Exchange Act of 1934, as amended, 15 U.S.C. Section 10j (b) and Securities and Exchange Commission Rule 10b-5, 17 C.F.R. Section 240.10b-5.

11. The shares of Innotrac purchased by Dadante with IPOF Fund money as a result of the device, scheme and artifice created by Innotrac, Dorfman, Gansey, Ellin, Hanger and Toner and Glantz, Advest, Everin and FBW and Dadante as alleged herein are now worth substantially less than Dadante had paid for those shares and due to the nature of the market and the demand for Innotrac stock those shares are virtually unsalable. Since Dadante was improperly using IPOF fund money to purchase those Innotrac shares, the actual losers in the manipulative device, scheme and artifice used by Innotrac, Dorfman, Gansey, Ellin, Hanger and Toner, Glantz, Advest, Everin and FBW and Dadante as alleged herein to purchase shares of Innotrac at artificially high prices are the plaintiffs who provided Dadante with the money that was used to purchase the Innotrac shares.

12. As a direct and proximate result of the activities of Innotrac, Dorfman, Gansey, Ellin, Hanger and Toner as described herein, activities that were

undertaken by each of them with scienter, each of the plaintiffs has lost his or her investment in the IPOF fund. Further, as a direct and proximate result of the activities of Innotrac, Dorfman, Gansey, Ellin, Hanger and Toner, activities which were undertaken by each of them with scienter, each of the plaintiffs has suffered additional economic losses and has been caused to suffer mental and physical pain, suffering, humiliation and anguish. Innotrac, Dorfman, Gansey, Ellin, Hanger and Toner are jointly and severally liable to each of the plaintiffs for the losses that each of the plaintiffs sustained as a direct and proximate result of the manipulative device, scheme, device and artifice as alleged herein that induced Dadante to use IPOF Fund money deposited by each of the plaintiffs to improperly purchase shares of Innotrac at artificially high prices.

COUNT TWO

(RICO Violation)

13. Plaintiffs reallege paragraphs 1 through 12 of this Complaint.

14. Defendants Innotrac, Dorfman, Gansey, Ellin, Hanger and Toner in conjunction with Dadante, Glantz, Advest, Everin and FBW engaged in a pattern of racketeering activity as that term is defined by Federal Statute. Each time Innotrac, Dorfman, Gansey, Ellin, Hanger and Toner engaged in the sale of Innotrac stock that the individual defendants had purchased from Innotrac with their stock options to Dadante as the representative of the IPOF

Fund at artificially inflated prices, Innotrac, Dorfman, Gansey, Ellin, Hanger and Toner engaged in a predicate violation of Racketeering Influenced and Corporate Organization ("RICO") Act, 18 U.S.C. Sections 1961 et seq.. The predicate acts of Innotrac, Dorfman, Gansey, Ellin, Hanger and Toner undertaken in violation of RICO caused each of the plaintiffs in this case to sustain injury. As a direct and proximate result of the RICO violations of Innotrac, Dorfman, Gansey, Ellin, Hanger and Toner, each of the plaintiffs sustained personal economic injury due to the losses incurred by the IPOF fund attributable to purchases of Innotrac, Inc. stock.

15. Innotrac, Dorfman, Gansey, Ellin, Hanger and Toner are each jointly and severally liable to each plaintiff pursuant to RICO in amounts equal to three (3) times that plaintiff's losses attributable to the purchase of Innotrac, Inc. stock by the IPOF fund.

COUNT THREE

(Common Law Fraud)

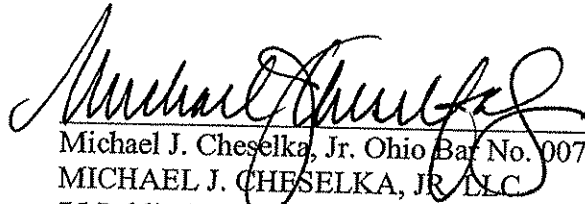
16. Plaintiffs reallege paragraphs 1 through 15 of this Complaint.

17. Innotrac, Dorfman, Gansey, Ellin, Hanger and Toner by their actions, individually and in concert with one another, as described herein defrauded each of the plaintiffs. Innotrac, Dorfman, Gansey, Ellin, Hanger and Toner engaged in their fraud willfully, wantonly, maliciously and in reckless disregard for the rights of plaintiffs.

WHEREFORE plaintiffs request that this Honorable Court:

- a. Find that Innotrac, Dorfman, Gansey, Ellin, Hanger and Toner violated Section 10 (b) of the Securities Exchange Act of 1934, 15 U.S.C. Section 78j (b), 17 C.F.R. 240.10-5, RICO, 18 U.S.C. Sections 1961 et seq. and committed fraud;
- b. Order Innotrac, Dorfman, Gansey, Ellin, Hanger and Toner each to disgorge to plaintiffs all profits Innotrac, Dorfman, Gansey, Ellin, Hanger and Toner made through the sale of Innotrac stock to Dadante acting as the representative of the IPOF Fund;
- c. Grant each plaintiff judgment against Innotrac, Dorfman, Gansey, Ellin, Hanger and Toner, jointly and severally, in an amount equal to the economic losses that each plaintiff has suffered;
- d. Grant each plaintiff judgment against Innotrac, Dorfman, Gansey, Ellin, Hanger and Toner, jointly and severally, in an amount equal to three (3) times the economic losses each plaintiff has suffered;
- e. Grant each plaintiff judgment against Innotrac, Dorfman, Gansey, Ellin, Hanger and Toner, jointly and severally, for compensatory damages to be determined at trial but in no event less than One Hundred Thousand Dollars (\$100,000.00) per plaintiff;
- f. Grant each plaintiff judgment against Innotrac, Dorfman, Gansey, Ellin, Hanger and Toner, jointly and severally, for punitive damages to be determined at trial but in no event less than Two Hundred Fifty Thousand Dollars (\$250,000.00) per plaintiff;

- g. Grant plaintiffs judgment against Innotrac, Dorfman, Gansey, Ellin, Hanger and Toner, jointly and severally, for interest on all sums found to be due to plaintiffs;
- h. Grant plaintiffs judgment against Innotrac, Dorfman, Gansey, Ellin, Hanger and Toner, jointly and severally, for the costs of this action including the reasonable attorney fees incurred by plaintiffs in the prosecution of this action, and
- i. Grant plaintiffs any further relief that this Court deems to be equitable and just.



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